Hi Kim,

The Newfoundland and Labrador Federation of Labour appreciates the opportunity to participate in the Atlantic Offshore OHS Initiative. As to the Proposed Policy Intent for Phase 3 of Atlantic OHS Regulations.

A couple of comments:

Pg 12. OHS Program Section 3) An Employer that is required to develop, implement and maintain an OHS program ….
   a) Review and, where necessary, revise the OHS program at least every 3 years, or:
      1. where there is a change of circumstances that may affect the health and safety of persons in the workplace; THIS NEEDS TO BE CLARIFIED. Can we name an example? What would a change of circumstance include?

Pg 15.
Section 12 General Training 1b) reads “regulatory awareness, including Employee rights and responsibilities (and reprisal)”. WE OBJECT TO (and reprisal). Please remove. It is both unnecessary and unwelcome.

Section 15.
Subsection 1 states an impaired employee must not work due to the possibility of being hazardous to the health and safety of other workplace employees. Yet subsection 2 overrides subsection 1 and seems to imply that an impaired worker is able in the event of an emergency. WHAT KIND OF EMERGENCY WOULD WARRANT AN IMPAIRED INDIVIDUAL WORKING?

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